

March 25, 2026

VIA E-FILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Honorable Suzanne Todnem
Office of Administrative Hearings 600 North
Robert Street
P.O. Box 64620
St. Paul, MN 55164-06204

RE: In the Matter of the Application of Lake Charlotte Solar, LLC for a Solar Energy Conversion Facility Site Permit for the up to 150 MW Lake Charlotte Solar Facility in Martin County, Minnesota.
MPUC DOCKET NO.: IP-7159/GS-25-206
CAH DOCKET NO.: 23-2500-41194

In the Matter of the Application of Lake Charlotte Storage, LLC for a Battery Energy Storage System Site Permit for the up to 150 MW Lake Charlotte Storage Project in Martin County, Minnesota.

MPUC DOCKET NO.: IP-7159/ESS-25-205
CAH DOCKET NO.: 23-2500-41194

Dear Ms. Bergman and Judge Todnem:

Lake Charlotte Solar, LLC (Lake Charlotte Solar) and Lake Charlotte Storage, LLC (Lake Charlotte Storage) (collectively, the Applicants), submit these reply comments in response to certain comments received during the Environmental Assessment (EA) comment period in the above dockets regarding the Joint Application for Site Permits (Application) for the up to 150 megawatt (MW) solar project (Solar Facility) and the up to 150 MW /600 megawatt hour (MWh) alternating current (AC) battery energy storage system (BESS) to be located in Martin County, Minnesota (collectively, the Solar Facility and the BESS are referred to as the Project). These reply comments primarily focus on:

- Comments related to the selection of the site and alternative site options;
- Comments related to community benefits from the Project;
- Comments raising concerns over possible impacts to prime farmland and the local agricultural economy;
- Comments related to aesthetic impacts of the Project;
- Comments related to potential fire risks posed by the Project;
- Comments regarding the decommissioning plan for the Project;

- Comments related to potential impacts to property values;
- Comments related to environmental and wildlife impacts;
- Comments from Minnesota state agencies regarding various Project impacts, mitigation measures, and permit conditions; and
- Comments from Unions, participating landowners, and community members in support of the Project.

I. PUBLIC COMMENTS

During the public comment period on the EA, the Commission received 34 written comments regarding the Project. Three people provided verbal comments at the in-person public hearing on February 25, 2026.

1. Public Comments Questioning the Location of the Project and Consideration of Other Locations

Commenters expressed concerns over the location of the Project in an agricultural and rural setting. Commenters also indicated the Project should be located somewhere else.

Applicants selected the Land Control Area based on significant landowner interest, transmission and interconnection suitability, optimal solar resource, and minimal impact on environmental resources.¹ During initial assessments to locate a site for the Project, Applicants determined the existing Southern Minnesota Municipal Power Agency (SMMPA) Rutland Substation was located in a region with a high solar resource and had adequate capacity to support the interconnection of the Project to the grid.² Another potential point of interconnection was also evaluated in an area of the state with less prime farmland, but it was determined that the point of interconnection did not have adequate capacity to support the Project.³ The existing SMMPA Rutland Substation and existing high voltage transmission lines will also allow Applicants to minimize the need to construct ancillary facilities beyond the immediate footprint of the Project.

Lake Charlotte Solar has an executed Generator Interconnection Agreement with SMMPA and Midcontinent Independent System Operator, Inc (MISO), enabling the Project to interconnect at the SMMPA Rutland Substation. The Applicant is pursuing an additional Generator Interconnection Agreement for the BESS to operate independently and receive and store energy directly from the electric grid.

2. Public Comments Questioning Whether the Project Will Benefit the Community

Several commenters questioned whether the Project would benefit the surrounding community.

¹ Exs. LCS-2 at § 2.1 (Application); LCS-17 (Direct Testimony of Marta Lasch).

² Ex. LCS-7 (Appendix D – Prime Farmland Alternatives Assessment).

³ Ex. LCS-7 (Appendix D – Prime Farmland Alternatives Assessment).

Applicants appreciate the concerns of the commenters. Minnesota law has been structured to ensure the local communities hosting renewable energy generation projects receive compensation by way of production tax. Lake Charlotte Solar estimates average annual solar energy production tax revenue of approximately \$287,000 for Martin County and approximately \$71,700 for Rutland Township over the life of the Project. In addition, lease and easement payments paid to the participating landowners will offset potential financial losses associated with removing a portion of their land from agricultural production. The Project will also provide significant socioeconomic benefits to local construction workers. The Applicants anticipate supporting up to 200 temporary construction and installation jobs for this Project and also following the prevailing wage requirements under Minnesota law and the Site Permits.

3. Public Comments Regarding Impacts to Farmland and Agricultural Economy

Commenters expressed concerns over the Project's removal of farmland, including prime farmland, from production and the resulting impacts to agriculture-related business in the region.⁴ Relatedly, concerns were also raised regarding possible impacts to public drain tile.⁵

The potential impacts to farmland, including prime farmland, were assessed in the EA, issued on February 11, 2026.⁶ The EA found that the Project will remove approximately 997.8 acres of farmland from crop production. This acreage only constitutes approximately 0.22 percent of cropland in Martin County. As a result, the EA concluded that the Project is not expected to have a significant impact on agricultural production in the County.⁷ Applicants also conducted an analysis of potential alternatives to the site to avoid prime farmland impacts and determined that no feasible or prudent alternatives to the site exists.⁸

Regardless, draft site permit conditions are protective of potential future agricultural uses of the site after decommissioning. Specifically, Section 4.3.18 of the Draft Site Permit for the Solar Facility (Solar DSP) mandates that Lake Charlotte Solar develop an Agricultural Impact Mitigation Plan (AIMP) for the Solar Facility in cooperation with the Minnesota Department of Agriculture (MDA) detailing methods to preserve topsoil, minimize compaction, control noxious weeds, maintain drainage conditions, and ensure the land can be returned to agricultural use after decommissioning.⁹ Lake Charlotte Solar developed an AIMP in coordination with the MDA and attached it as Appendix E to the Application.¹⁰

⁴ Batch Public Comments at 2-4, 7-8, 10, & 12-14 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)); Batch Public Comments at 4, 6 (Mar. 13, 2026) (eDockets No. [20263-229231-01](#)).

⁵ Batch Public Comments at 2 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)); In-Person Public Hearing Tr. at 25-27 (Feb. 25, 2026).

⁶ Ex. PUC-EIP-5 at (EA).

⁷ Ex. PUC-EIP-5 at § 4.5.1 (EA).

⁸ Ex. LCS-7 (Application, Appendix D – Prime Farmland Alternatives Assessment).

⁹ Ex. PUC-EIP-5 at § 4.5.1 (EA); Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

¹⁰ Ex. LCS-8 (Application, Appendix E – AIMP).

Numerous other permit conditions also address potential agricultural impacts. Sections 4.3.9, 4.3.10, and 4.3.11 of the Solar DSP and the Draft Site Permit for the BESS (BESS DSP) require protection and segregation of topsoil protection (4.3.9), measures to minimize soil compaction (4.3.10) and implementation of soil erosion and sediment control practices recommended by the Minnesota Pollution Control Agency (MPCA; 4.3.11), respectively.¹¹ Section 4.3.17 of the Solar DSP requires the development of a vegetation management plan (VMP) that defines how the land control area will be revegetated and monitored over the life of the Solar Facility to stabilize soils and improve soil health. Sections 4.3.20 and 4.3.21 of the Solar DSP and 4.3.17 and 4.3.18 of the BESS DSP address invasive and noxious weeds. Lake Charlotte Solar, moreover, has and continues to coordinate with Martin County to ensure impacts to the drain tile are minimized.¹² And Section 4.3.22 of the BESS DSP and Section 4.3.25 of the Solar DSP require that Applicants take measures to minimize impacts to the drain tile, and repair and/or compensate landowners for any damages to the tile during construction.¹³

4. Public Comments Regarding Aesthetic Impacts

Members of the public submitted comments raising concerns over the aesthetic impacts of the Project including, but not limited to, impacts to residents living along Charlotte Oak Drive and residents of Northrup.¹⁴

The EA evaluated potential aesthetic impacts of the Project. The EA found that aesthetic impacts for certain residents in close proximity to the Project will be moderate to significant; however those aesthetic impacts will be mitigated through the development of a Visual Screening Plan as required by Section 5.1 of the Solar DSP.¹⁵ The Visual Screening Plan must include screening objectives, species details, planting locations, and maintenance plans, and the permittee must maintain the vegetation for three years.

In the initial Application, Lake Charlotte Solar committed to installing vegetative plantings along 170th Street to screen residential areas in the Town of Northrop from the Solar Facility.¹⁶ Following concerns expressed by residents, however, and in addition to the planned vegetative screening along 170th Street, Lake Charlotte Solar has further developed a screening plan to place vegetative screening between the Solar Facility and residences along Charlotte Oak Drive.¹⁷ Lake Charlotte Solar has also developed a Visual Screening Plan for adjacent residences where the resident has expressed concern about the visual impacts and/or where screening could reduce the visual impact of the Solar Facility on adjacent residences.¹⁸

¹¹ Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

¹² Ex. PUC-EIP-5 at § 4.3.4 (EA).

¹³ Ex. PUC-9 at §§ 4.3.29 & 4.4 ; PUC-10, §§ 4.3.26 & 4.4.

¹⁴ Batch Public Comments at 5, 9, 11, 13-14 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)); Batch Public Comments at 6 (Mar. 13, 2026) (eDockets No. [20263-229231-01](#)).

¹⁵ Ex. PUC-EIP-5 at § 4.3.1 (EA).

¹⁶ Ex. PUC-EIP-5 at § 4.3.1 (EA).

¹⁷ Ex. LCS-17 at 5-6 (Direct Testimony of Marta Lasch).

¹⁸ Ex. LCS-17 at 6 and Schedule C (Direct Testimony of Marta Lasch).

The Solar DSP and BESS DSP include additional conditions addressing aesthetic impacts. Section 4.3.8 is a standard requirement for the permittee to consider landowner input on visual impacts and to preserve the natural landscape while minimizing tree removal during construction and operation. Section 5.2 of the Solar DSP requires coordination with the Minnesota Department of Transportation (MnDOT) regarding vegetation near Trunk Highway 15 for roadside vegetation management and blowing-snow control.¹⁹

5. Public Comments Regarding Fire Risk

Commenters expressed concerns over possible fire risks resulting from the Project.²⁰

The Project is designed such that each of the standalone BESS enclosures will be equipped with automatic fire detection and suppression systems.²¹ Moreover, a firebreak will be maintained around the Project to minimize the risk of a fire spreading from the Project to surrounding areas should one occur.²² Applicants have also conducted training for local emergency responders and will continue to do so during Project operation.

The EA evaluated fire risks posed by the Project.²³ The EA notes that the risk of fire will be reduced by proper installation of the PV solar system and further finds that the project is designed to meet applicable federal, state, and local standards, including during construction. Electrical inspections, moreover, are required to meet state electrical codes, and will ensure proper installation of all components, and the Project will undergo routine inspection.²⁴ Section 8.12 of the Solar DSP and Section 8.11 of the BESS DSP each require Applicants to file an Emergency Response Plan with the Commission and local first responders prior to operation; these conditions will further mitigate fire risks posed by the Project.²⁵

6. Public Comments Regarding Project Decommissioning

Members of the public expressed concerns over the processes and financial surety for decommissioning the Project; a primary concern was whether the County or other local

¹⁹ Ex. PUC-EIP-5 at § 4.3.1 (EA); Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

²⁰ Batch Public Comments at 2 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)); Batch Public Comments at 4, 6 (Mar. 13, 2026) (eDockets No. [20263-229231-01](#)); In-Person Public Hearing Tr. at 30-31 (Feb. 25, 2026).

²¹ Ex. LCS-2 at § 5.2.5.1 (Application).

²² In-Person Public Hearing Tr. at 31 (Feb. 25, 2026).

²³ Ex. PUC-EIP-5 at § 4.4.2 (EA).

²⁴ Ex. PUC-EIP-5 at § 4.4.2 (EA).

²⁵ Ex. PUC-EIP-5 at § 4.4.2 (EA).

governments would be responsible for the cost of decommissioning and whether the site could actually be restored after the Project.²⁶

Section 9.1 of the Solar DSP and BESS DSP requires the development of a decommissioning plan prior to construction and updates of the plan every five years. As part of the initial Application, Lake Charlotte Solar developed and submitted a Decommissioning Plan. The Decommissioning Plan details the process for decommissioning and provides a cost estimate for those activities. Applicants are responsible for all costs to decommission the Project and associated facilities. A financial assurance in the form of an escrow account or surety bond equal to 125 percent of the costs to ensure proper decommissioning will be provided, as prescribed by the Decommissioning Plan, with Martin County listed as the beneficiary.²⁷ In the event the Applicants do not decommission the Project as required by the site permits, Martin County will be able to draw upon the financial assurance to decommission the Project. A discussion of PUC-EIPs comments on the Project's decommissioning plan is provided below.

As noted above, the AIMP, developed in cooperation with the MDA, prescribes measures to preserve topsoil, minimize compaction, control noxious weeds, maintain drainage conditions, and ensure the land can be returned to agricultural use after decommissioning, including through the establishment of appropriate vegetation.²⁸

7. Public Comments Regarding Property Values

Commenters expressed concerns over the impacts of the Project on property values.²⁹

The EA assessed potential impacts on property values and assessed that, on the whole, impacts to property values are anticipated to be minimal and decrease with distance and over time. However, it also noted that impacts to a specific property's value may be difficult to determine and that due to that uncertainty, impacts on specific properties could be minimal to moderate.³⁰ In its analyses, the EA relied upon three studies. First, a study conducted by the Lawrence Berkeley National Laboratory found that, in Minnesota, homes within one-half mile of large solar energy facilities had a four percent reduction in home sales prices compared to homes two to four miles from such a facility. The study did not consider site design, local landscape features or setbacks, or the broader economic impacts of solar facilities.³¹ A second study from Chisago County, Minnesota did not find a consistent negative impact to the sales value of properties near large solar facilities. A third study comparing sale prices of properties near 10 existing large solar facilities (including one in Minnesota) with comparable properties did not find a consistent negative impact to the sales

²⁶ Batch Public Comments at 2, 13-14 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)); In-Person Public Hearing Tr. at 28-29, 33-35 (Feb. 25, 2026).

²⁷ Ex. LCS-9 at 8 (Application, Appendix F – Draft Decommissioning Plan).

²⁸ Ex. PUC-EIP-5 at § 4.5.1 (EA); Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

²⁹ Batch Public Comments at 2, 9 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)).

³⁰ Ex. PUC-EIP-5 at 17 (EA).

³¹ Ex. PUC-EIP-5 at § 4.3.5 (EA).

value of properties near large solar facilities. As a result, the EA concluded that minimal to moderate property value impacts could occur, but significant negative impacts to property values are not anticipated.³²

The EA also concluded that permit conditions in the Draft Site Permits will help mitigate potential impacts to property values. Specifically, Section 4.3.8 of the Solar DSP and BESS DSP requires the permittee to consider landowner input regarding visual impacts and to preserve the natural landscape and minimize tree removal during construction and operation. Section 5.1 of the Solar DSP is a special condition requiring the permittee to develop a site-specific Visual Screening Plan to mitigate visual impacts on adjacent residences.³³ As noted above, moreover, Lake Charlotte Solar has expanded the extent of visual screening beyond 170th Street near Northrop to include areas between the Solar Facility and those residents living next along Charlotte Oak Drive.³⁴ Visual screening requirements are expected to reduce Project impacts to property values.³⁵

8. Public Comments Regarding Environmental Impacts

Members of the public raised concerns over environmental impacts of the Project, including potential soil, surface water impacts, stormwater runoff, and wildlife impacts.³⁶ The EA evaluated the potential impacts of the Project on soil, surface water, stormwater and wildlife.

The risk of soil and water contamination from the Solar Facility or BESS is low.

As noted in the Application, each of the solar panel manufacturers being considered to provide panels completes testing for hazardous substances; the manufacturers have confirmed that no hazardous substances are leached from the tested solar panel products resulting in leachate concentrations that exceed regulatory standards. Considering the solar panels are fully encapsulated, unlikely to shatter, and not expected to leach hazardous materials into the environment, the risk to the environment from the contents of the panels will be minimal. If a panel is broken at the Solar Facility, the broken pieces and the remainder of the panel will be recycled or disposed of and replaced, thereby further reducing the risk for hazardous materials contained in the panels to leach into the environment.³⁷

Hazard mitigation measures will be utilized to avoid BESS fire safety and environmental contamination risks including storing lithium-ion batteries in weather-proof enclosures that include fully integrated heating, ventilation, and air conditioning system for temperature control,

³² Ex. PUC-EIP-5 at § 4.3.5 (EA).

³³ Ex. PUC-EIP-5 at § 4.3.5 (EA); Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

³⁴ Ex. LCS-17 at 5-6 (Direct Testimony of Marta Lasch).

³⁵ Ex. PUC-EIP-5 at §§ 1.5, 4.3.5 (EA).

³⁶ Batch Public Comments at 2, 5, 11 (Mar. 12, 2026) (eDockets No. [20263-229185-01](#)); Batch Public Comments at 6 (Mar. 13, 2026) (eDockets No. [20263-229231-01](#)).

³⁷ Ex. LCS-2 at § 4.7.1 (Application).

sensors and controls for remote monitoring, and built-in fire detection and suppression.³⁸ The Battery Management System and site controller ensure the BESS is operating within the original equipment manufacturer's operating parameters and warranty requirements. In the event of an emergency at the BESS, if any operating limit is exceeded, the system will shut down the affected equipment and automatically dial a fire monitoring service who will contact the local fire department, plant manager, and Geronimo Power's Remote Operating Center. Current battery technology has also advanced so that fire risk is less prevalent. The batteries are more thermally stable and less prone to thermal runaway than batteries comprised of older battery chemistry that will not be used for the BESS. Applicants are also committed to working with the local emergency responders to make sure they have the tools and training they need to respond to emergencies at the Project.³⁹

The EA concluded that impacts to soils will occur during construction and decommissioning of the Project, but the impact intensity level is expected to be minimal. Because the soil at the Solar Facility will be covered with native perennial vegetation for the life of the Project, soil health is likely to improve long-term.⁴⁰

The impact intensity level to surface waters is anticipated to be minimal according to the EA. Direct impacts to surface waters are not expected. Indirect impacts to surface waters may occur, but will be short-term, of a small size, and localized. Impacts can be mitigated through consultation with local organizations and government agencies, and through implementing BMPs for sediment and erosion control.⁴¹ Lake Charlotte Solar will also construct permanent stormwater basins in the Project design, which can help release stormwater runoff at the existing or a reduced rate and create natural infiltration.⁴² Section 5.9 of the Solar DSP requires consultation with the Minnesota Department of Natural Resources (DNR) and Martin County Soil and Water Conservation District regarding potential impacts to nearby surface waters during construction. Section 5.10 of the Solar DSP requires consultation with the MnDOT and MPCA regarding stormwater basin design.

Evaluating the Project's potential impacts to wildlife, the EA concluded that the overall impact intensity for wildlife and habitat is expected to be minimal to moderate, with impacts varying by species. Long-term positive impacts, moreover, to small mammals, insects, reptiles, and amphibians are anticipated as the site is revegetated with native perennial vegetation. Here, the EA found that conversion of agricultural land to perennial vegetation will positively impact terrestrial and aquatic wildlife by reducing pesticide use and increasing pollinator and bird habitat.⁴³

Draft Site Permit conditions will further reduce impacts on wildlife. Specifically, various permit conditions require: restoring the Solar Facility site with native perennial vegetation supporting gamebirds, songbirds, and pollinators; coordinating fence design with DNR; implementing

³⁸ Ex. LCS-2 at § 5.2.5.1 (Application).

³⁹ Ex. LCS-17 at 10-11 (Direct Testimony of Marta Lasch).

⁴⁰ Ex. PUC-EIP-5 at 9-10 (EA).

⁴¹ Ex. PUC-EIP-5 at 9-10 (EA).

⁴² Ex. PUC-EIP-5 at §§ 1.5 & 4.7.7 (EA).

⁴³ Ex. PUC-EIP-5 at § 4.7.2 (EA).

shielded, low-blue lighting; using non-chloride dust control and wildlife-safe bio-netting; and submitting quarterly wildlife injury and fatality reports for both Solar and BESS facilities as required under the relevant permit sections.⁴⁴

9. Public Comments Supporting the Project.

Ten landowners participating in the Project submitted comments in support of the Project noting it will provide their families - local farmers and landowners - an opportunity to diversify their income. The commenters highlighted their rights as taxpayers to choose how they wish to use their land. They also noted the Project will preserve farmland for future generations to farm when the Project is decommissioned and will help local landowners maintain ownership of their agricultural properties. Another commenter thanked Geronimo Power, the owner of Applicants for a donation to a local robotics team.⁴⁵

Applicants appreciate the positive comments about the benefits the Project has and will continue to bring to the local community.

II. STATE AGENCY COMMENTS

1. PUC-EIP Recommendations for Decommissioning Plan and Draft Site Permits.

PUC-EIP submitted comments with recommendations for updates to the Decommissioning Plan and summarized the changes to Draft Site Permit conditions as included in the EA.⁴⁶

PUC-EIP recommended updates to the Decommissioning Plan to incorporate several clarifications and additions prior to construction. It noted that although some of this information is located elsewhere in the record, it should be included in the decommissioning plan for ease of use. PUC-EIP also noted that many of the Decommissioning Plan elements met PUC-EIPs expectations at this time. Specific updates requested by PUC-EIP include adding a site map, commercial operation date, grid connection description, eDocket location, and clarification as to whether participating landowners have sold or leased the property for the Project. PUC-EIP further requested that the Decommissioning Plan include a more detailed statement how the offtake of the power will – including a general of where the power will be used, such as a PPA or utility owned portfolio, a description of how stormwater basins will be removed and restored, and a more detailed description of decommissioning timeline and schedule. The Applicants appreciate the recommendations and will make these updates, as well as the others requested in PUC-EIP's comments, and provide them as required before construction.

⁴⁴ Ex. PUC-EIP-5 at § 4.7.7 (EA); Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

⁴⁵ Batch Public Comments (Mar. 13, 2026) (eDockets No. [20263-229231-01](#)).

⁴⁶ PUC-EIP Comments (Mar. 13, 2026) (eDockets No. [20263-229251-01](#)).

The Commission issued sample site permits on February 3, 2026.⁴⁷ PUC-EIP staff included a Proposed Draft Site Permits for both the Solar Facility and the BESS as Appendix C of the EA. PUC-EIP staff's comments summarized the changes between the sample permits and PUC-EIP staff's Solar DSP and the BESS DSP. Applicants reviewed the Solar DSP and BESS DSP and included its requested changes to the Solar DSP and BESS DSP in the Direct Written Testimony of Marta Lasch.⁴⁸

2. DNR Comments

DNR submitted comments requesting that Applicants ensure fence height surrounding the Project be at least 10 feet tall. The comment noted that DNR will not issue a permit for taking if the woven wire fence is lower than 10 feet and that MNDR further supports permit condition 4.3.32 of the Solar DSP requiring the permittee to design the final security fence in coordination with the DNR. Applicants will coordinate with DNR regarding fence design and, if necessary, appropriate measures operations and maintenance personnel can take to ensure the safe exit of deer, without harassment, from the fenced areas.

DNR also encouraged coordination with local snowmobile clubs to accommodate route changes to segment #161 of the Prairieland Trail that crosses the Project area.⁴⁹ The Prairieland Trail is not anticipated to be impacted by the Project and so a reroute of the trail is unnecessary.⁵⁰ Nonetheless, Applicants will coordinate with local snowmobile clubs to minimize potential conflicts between the Project and the snowmobile trail, particularly during construction.⁵¹

Finally, DNR commented that its review of the Applicant's VMP found non-native and soil-incompatible species, which can outcompete native plants and hinder vegetation establishment; DNR further advised against planting non-native species as part of the VMP. DNR also commended the Lake Charlotte Solar's commitment to Board of Water and Soil Resources' Habitat Friendly Solar Gold Standard and looks forward to continued coordination to ensure successful vegetation establishment.⁵²

Applicants will review the seed mix in the VMP and will coordinate with the DNR and the Vegetation Management Plan Working Group (VMPWG) to determine the final seed mix. Applicants appreciate DNR's commendation on the VMP. When assessed using the Board of Water and Soil Resources (BWSR) Habitat Friendly Solar Site Assessment Form for Project Planning (BWSR Scorecard) the seed mixes and measures prescribed by the VMP do indicate the Project could achieve BWSR's 'Gold Standard.' While Applicants have proposed a robust VMP that would qualify for BWSR's Gold Standard, they would like to clarify that they have not committed to achieving that standard. The Applicants indicated the VMP's primary objective is

⁴⁷ Ex. PUC-EIP-5, Appendix C (EA, Appendix C – Draft Site Permits).

⁴⁸ Ex. LCS-17 (Direct Testimony of Marta Lasch).

⁴⁹ DNR Comment (Mar. 13, 2026) (eDockets No. [20263-229284-01](#)).

⁵⁰ Ex. PUC-EIP-5 at 72 (EA).

⁵¹ Ex. PUC-EIP-5 at 79 (EA).

⁵² DNR Comment (Mar. 13, 2026) (eDockets No. [20263-229284-01](#)).

to support Applicants' restoration and vegetation propagation goals by establishing resilient, site-specific vegetation that enhances soil stability, biodiversity, and aligns with local ecological goals, while also minimizing long-term maintenance costs.⁵³ Consistent with Solar DSP Section 4.3.16, if, after perennial vegetation is established, the site is again scored using the BWSR Scorecard and it meets BWSRs Gold Standard then Applicants would be proud of that achievement and could then choose to participate in the Habitat-Friendly Solar Program and seek program certification for the Project.

DNR further expressed support for the following Solar DSP special conditions as written: 5.11 (facility lighting), 5.12 (dust control), and 5.13 (erosion control). Applicants note the BESS DSP contains similar conditions (i.e., Sections 4.3.28, 4.3.29 and 4.3.30). Finally, DNR requested the Commission remove it from Solar DSP special condition 5.9 as DNR's concerns regarding the Project's impacts to surface waters are sufficiently addressed in special condition 5.12 and 5.13.⁵⁴

Applicants appreciate the DNR's comments. The Applicants will continue to coordinate with the DNR on the Projects' VMP and Project fencing.

3. Vegetation Management Planning Working Group Comments

The VMPWG provided comments on the Project's VMP.⁵⁵ The VMPWG did not recommend any action by the Commission at this time but provided comments on the VMP to facilitate transparency in the record as the VMPWG works with the Applicants to arrive at a VMP that is adequate to meet pre-construction compliance filing requirements. The VMPWG noted that the VMPs plan for site restoration and implementation appears to be achievable to meet the anticipated permit conditions and the Applicants' objectives.

Additionally, the VMPWG provided comments and recommendations that should be incorporated into the pre-construction VMP submittal. Comments and recommendations covered numerous topics related to management areas, site preparation, seed installation, seed mixes, visual screening; mowing and haying, grazing, herbicide use and weed control, management, monitoring and reporting. The VMPWG also encouraged Applicants to enroll in the Habitat Friendly Solar Program for MRETs credit eligibility.⁵⁶

The Applicants appreciate the VMPWG's comments and recommendations and will continue to work with the VMPWG to further revise the VMP prior to construction.

4. Union Comments

⁵³ Ex. LCS-8 at i (Application, Appendix C – VMP).

⁵⁴ DNR Comment (Mar. 13, 2026) (eDockets No. [20263-229284-01](#)).

⁵⁵ VMPWG Comments (Mar. 13, 2026) (eDockets No. [20263-229278-01](#)).

⁵⁶ VMPWG Comments (Mar. 13, 2026) (eDockets No. [20263-229278-01](#)).

International Brotherhood of Electrical Workers Local 343 (IBEW Local 343) and LIUNA Minnesota and North Dakota (LIUNA) commented that projects like Lake Charlotte are important to the over 15,000 skilled electricians and construction laborers. IBEW Local 343 and LIUNA commented that the Project has potential to deliver significant energy and socioeconomic benefits, including ongoing employment and career opportunities for IBEW Local 343 and LIUNA members. IBEW Local 343 and LIUNA encouraged Applicants to work with IBEW Local 343, LIUNA and International Union of Operating Engineers Local 49 to identify potential solutions that will help to ensure successful completion of the project.⁵⁷

The Applicants appreciate the comments of IBEW Local 343 and LIUNA and their willingness to assist in identifying potential solutions to help ensure successful completion of the Project. As indicated in the Application, the contractor selected to construct the Project will be required to work with appropriate entities, including unions, such as IBEW Local 343 and LIUNA, to develop and implement a construction staffing model that maximizes local hiring and the local economic benefits for the Project, while ensuring the Project is safely built on time and on budget.

The document referenced above has also been electronically filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service Lists of record.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Jeremy P. Duehr

Jeremy P. Duehr

Direct Dial: 612.492.7413

Email: jduehr@fredlaw.com

⁵⁷ IBEW Local 343 & LIUNA Comments (Mar. 16, 2026) (eDockets No. [20263-229292-01](#)).

In the Matter of the Application of Lake Charlotte Solar, LLC for a Solar Energy Conversion Facility Site Permit for the up to 150 MW Lake Charlotte Solar Facility in Martin County, Minnesota

MPUC Docket No. IP-7159/GS-25-206
CAH Docket No. 23-2500-41194

In the Matter of the Application of Lake Charlotte Storage, LLC for a Battery Energy Storage System Site Permit for the up to 150 MW Lake Charlotte Storage Project in Martin County, Minnesota

MPUC Docket No. IP-7159/ESS-25-205
CAH Docket No. 23-2500-41194

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 25th day of March 2026, she e-filed a true and correct copy of the Response Comments on behalf of Lake Charlotte Solar, LLC and Lake Charlotte Storage, LLC via eDockets (www.edockets.state.mn.us):

Said document was also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission as attached hereto.

Executed on: March 25, 2026

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
60 South Sixth Street, Suite 1500
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-205 Official CC Service List
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-205 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-205 Official CC Service List
4	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-205 Official CC Service List
5	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-205 Official CC Service List
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	25-205 Official CC Service List
7	Emily	Johnson	emily.johnson1@state.mn.us		Public Utilities Commission		Electronic Service		No	25-205 Official CC Service List
8	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-205 Official CC Service List
9	Marta	Lasch	mlasch@geronimopower.com	Lake Charlotte Solar, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	25-205 Official CC Service List
10	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-205 Official CC Service List
11	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-205 Official CC Service List
12	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	25-205 Official CC Service List
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-205 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert Street North PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	25-205 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-206 Official CC Service List
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-206 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-206 Official CC Service List
4	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-206 Official CC Service List
5	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-206 Official CC Service List
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	25-206 Official CC Service List
7	Emily	Johnson	emily.johnson1@state.mn.us		Public Utilities Commission		Electronic Service		No	25-206 Official CC Service List
8	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-206 Official CC Service List
9	Marta	Lasch	mlasch@geronimopower.com	Lake Charlotte Solar, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	25-206 Official CC Service List
10	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-206 Official CC Service List
11	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-206 Official CC Service List
12	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	25-206 Official CC Service List
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-206 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert Street North PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	25-206 Official CC Service List